



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

AUG 03 2011

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Scott Farmer, Chief Executive Officer
Cintas Corporation
P.O. Box 625737
Cincinnati, OH 45262

Re: Clean Air Act Reporting Requirement and Testing Order

Dear Mr. Farmer:

The United States Environmental Protection Agency ("EPA") is evaluating whether Cintas Corporation's facility in Cumberland, Rhode Island is in compliance with the Clean Air Act ("the Act") and state and federal regulations promulgated under the Act. These requirements include but are not limited to the federally enforceable sections of the State of Rhode Island and Providence Plantations state implementation plan, which contains Rhode Island Air Pollution Control Regulation 9 governing air pollution control permits.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act. The reporting requirement ("RR") section of this letter requires Cintas to provide specific information about operations at its Cumberland facility. The testing order ("TO") section of this letter orders Cintas to test emissions from its Cumberland facility.

Definitions

"Cumberland facility" or "facility" shall mean the Cintas facility located at 300 Highland Corporate Drive, Cumberland, Rhode Island.

"Day" shall mean a calendar day. When any due date herein falls on a weekend or holiday, the due date shall be deemed to be the following business day.

"Date of receipt" shall be the date indicated on the certified mail "green card," or in any other written acknowledgement of receipt of this Reporting Requirement and Testing Order.

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"Hazardous air pollutant" or "HAP" shall be as defined at Rhode Island Air Pollution Control General Definitions Regulation.

"Volatile organic compound" or "VOC" shall be as defined at Rhode Island Air Pollution Control General Definitions Regulation.

"Potential to emit" or "PTE" shall be as defined at Rhode Island Air Pollution Control General Definitions Regulation.

Reporting Requirement

- 1) Beginning within 30 days of the date of receipt, Cintas shall document daily the weight of soiled shop towels received and processed (laundered and dried), in pounds, and the dry weight of clean shop towels, in pounds. This data shall be compiled in a spreadsheet compatible with Microsoft Excel, or in table format (compatible with Microsoft word), and submitted to EPA on a quarterly basis, beginning within 120 days of the date of receipt.

Testing Order

This TO requires Cintas to sample and test emissions of volatile organic compounds and hazardous air pollutants from its Cumberland facility. Within the number of days specified in each paragraph below, Cintas is required to provide all the information and take the steps outlined below.

- 1) Within 30 days of the date of receipt, contact EPA's Bill Osbahr, at (617) 918-8389, to schedule a conference. At this conference, EPA will review with Cintas the various sampling, monitoring, testing, and analysis locations, procedures, and methods to be followed for the monitoring and performance tests.
- 2) Within 60 days of the date of receipt, prepare and mail to EPA for review an emissions testing protocol for the determination of the facility's potential to emit VOC and HAP. Cintas shall sample and test emissions of VOCs and HAPs from operations at the Cumberland facility, including, but not limited to: exhausts associated with Lavatec washing machines 1-9, and Lavadry dryers on-site (five 450 lb capacity units as well as the "pony" dryer), the sorting/receiving area and the wastewater treatment area. Monitoring and testing must use the applicable methods specified in 40 C.F.R. Part 60, Appendix A.
- 3) Within 90 days of the date of receipt, revise and resubmit the emissions testing protocol in accordance with any EPA written comments or required changes. EPA shall approve, approve with conditions, or disapprove the emissions testing protocol in writing.

- 4) Within 120 days of the date of receipt, Cintas must conduct pre-screening for VOC and HAP emission levels at the Cumberland Facility. Cintas shall conduct pre-screening of both the dryer exhaust and building exhaust points using Method TO-15 for HAPs and Method 25 and/or Method 25A for VOCs, in order to characterize the range of emission concentrations that may be expected during emissions testing, and in order to speciate compounds present in the air emissions.
- 5) Within 120 days of the date of receipt, Cintas shall hold a pre-test conference with EPA and schedule the testing date(s).
- 6) Within 150 days of the date of receipt, Cintas shall conduct emissions testing to measure VOC and HAP emissions, in accordance with the approved emissions testing protocol.
- 7) With respect to testing, Cintas is required to provide all of the information and take the steps outlined below. Specifically, Cintas shall:
 - a) Use Method 25 and/or Method 25A to measure VOC and Method 18, Method 320, Method TO-15, and/or other EPA approved method for measuring HAPs;
 - b) Create temporary (or permanent) total enclosures around the soils receiving area (sorting area), wash room, and wastewater treatment area that meet Method 204 prior to conducting testing, including:
 - i) Taking all proper measures to ensure that the testing is conducted in a safe manner. In order to establish a safe work environment within the enclosures, Cintas may need to provide additional ventilation in order to keep concentrations of volatile organic compounds (VOCs) at acceptable levels in the facility during the emissions test period. For example, this may be accomplished via use of fans, or fans with flex-line trunks to pull air through the room, or opening natural draft openings (NDOs).
 - ii) While the enclosures are in place, continuously monitoring combustible gas concentrations inside each enclosure to ensure Cintas is operating below the lower explosive limit (LEL) for combustible gases;
 - iii) Ensuring that all OSHA and other safety-related requirements for workplace safety are met (which may require the use of appropriate personal protective equipment, such as respirators).
 - iv) Demonstrating that temporary (or permanent) total enclosures have been established prior to and during testing by demonstrating a negative pressure environment for each enclosure. A continuous pressure monitoring recording device shall be used to document the pressure within the enclosure(s).
 - c) Monitor emissions of VOCs and HAPs from all exhaust vents on each enclosure, including:

- i) Installing continuous emission monitors (CEM) for monitoring and recording VOC concentrations (which meet Method 25A) in vent locations.
 - ii) Installing a continuous flow measurement system capable of measuring and recording flow rates at vent locations.
- d) Conduct testing under a maximum capacity scenario with heavily soiled shop towels, including:
 - i) Ensuring sufficient soiled towels exist for each test period such that maximum daily laundry throughput for shop towels is achieved; and
 - ii) Providing documentation to EPA which illustrates that the towels processed during the PTE test period represent a maximum capacity scenario of representative towels received from their customers;
 - iii) Following proper chain of custody procedures for the towels prior to testing.
 - iv) Retaining soiled towels within a sealed storage container immediately once soiled towels are received from the customer until the date of the test when they may be opened for the laundering process inside the sorting enclosure;
 - v) Labeling and identifying each batch of towels received with:
 - (1) Type of towel (provide Cintas' color designation);
 - (2) Date and time of customer pickup; and
 - (3) Customer name or identifier.
- 8) With respect to reporting, within 30 days of completing the test, Cintas must:
 - a) Submit a complete test report to EPA;
 - b) Provide the date and time that any concentrations of combustible gases exceeded the lower explosive limit within the enclosure and description of the corrective actions taken;
 - c) Provide a list of any deviations in the negative pressure within the enclosure and detailed descriptions of the corrective actions taken;
 - d) Provide information on the facility wastewater pretreatment operations including:
 - i) An indication as to whether the wastewater ozone injection system was or was not in operation on each day of the emissions testing; and
 - ii) The daily effluent flow data for the wastewater treatment operations during each day of testing.

Attachment A to this TO provides lists of required elements for pre-test protocols and test reports. Mail the submissions required by this letter to:

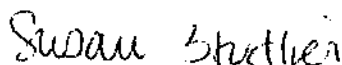
Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100, OES04-2
Boston, MA 02109-3912
Attn: Joan Jouzaitis, Air Technical Unit (Mail Code OES04-2)

Be aware that if Cintas does not provide the requested information in a timely manner, fails to submit an emissions test protocol in accordance with EPA's requirements, fails to conduct the required emissions test in a timely manner, or fails to submit a complete and timely test report, EPA may order Cintas to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Federal law establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

Cintas may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emissions data, are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Cintas. Please be aware that states may have different regulations governing the protection of confidential business information.

If you have any questions regarding this information request, please contact Joan Jouzaitis, Environmental Engineer, at (617) 918-1846 or, have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

Enclosures

cc: Andrew Careau, General Manager, Cintas, Cumberland, RI
Bill Osbahr, EPA, OEME
Ted Burns, RI DEM

